

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND MANAGEMENT
BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, et al.

Debtors.¹

PROMESA
Title III

Case No. 17 -BK -3283-LTS

(Jointly Administered)

In re:

THE FINANCIAL OVERSIGHT AND MANAGEMENT
BOARD FOR PUERTO RICO,

as representative of

PUERTO RICO ELECTRIC POWER AUTHORITY,

Debtor.

Case No. 17 -BK -4780-LTS

Re: ECF No. 975

NATIONAL PUBLIC FINANCE GUARANTEE
CORPORATION, ASSURED GUARANTY CORP.,
ASSURED GUARANTY MUNICIPAL CORP., AND
SYNCORA GUARANTEE INC.,

Movants,

v.

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

PUERTO RICO ELECTRIC POWER AUTHORITY,

Respondent.

¹ The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); and (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

**INFORMATIVE MOTION SUBMITTING THE PROPOSED ORDER
DENYING THE URGENT MOTION OF FINANCIAL OVERSIGHT
AND MANAGEMENT BOARD, AS REPRESENTATIVE OF DEBTOR,
TO COMPEL PRODUCTION OF DOCUMENTS FROM MOVANTS
RELATING TO THEIR MOTION FOR RELIEF FROM AUTOMATIC STAY**

To the Honorable United States Magistrate Judge Judith Gail Dein:

Assured Guaranty Municipal Corp., Assured Guaranty Corp., National Public Finance Guarantee Corporation, and Syncora Guarantee Inc. (collectively, the “Insurers”), and the Puerto Rico Electric Power Authority (“PREPA”), by and through the Financial Oversight and Management Board (the “Oversight Board” and together with the Insurers, the “Parties”), as representative of PREPA pursuant to Section 315(b) of the Puerto Rico Oversight, Management, and Economic Stability Act, codified at 48 U.S.C. §§ 2101-2241 (“PROMESA”), jointly submit this informative motion in compliance with the Court’s direction at the February 26, 2018 hearing along with the *Proposed Order Denying Urgent Motion of Financial Oversight and Management Board, as Representative of Debtor, to Compel Production of Documents from Movants Relating to their Motion for Relief from Automatic Stay*, attached as Exhibit A (“Proposed Order”), and respectfully state as follows:

1. On February 7, 2018, the Oversight Board filed the *Urgent Motion of Financial Oversight and Management Board, as Representative of Debtor, to Compel Production of Documents from Movants Relating to their Motion for Relief from Automatic Stay* (Docket No. 1065,² corrected at Docket No. 1066) (the “Urgent Motion”) seeking an order compelling the Insurers to produce the documents sought in the Urgent Motion. On February 14, 2019, the Insurers filed an opposition and other papers opposing the Urgent Motion (Docket No. 1084). On February 22, 2019, the Oversight Board filed a reply in further support of the Urgent Motion (Docket No. 1101).

² Unless otherwise indicated, docket numbers refer to Case No. 17-BK-4780.

2. The Court heard oral argument on the Urgent Motion on February 26, 2018 (the “Hearing”). At the conclusion of the Hearing, the Court stated that it would deny the Urgent Motion and suggested certain additional directives. The Parties to the Urgent Motion agreed to meet and confer in order to submit a proposed order to the Court by March 1, 2019.

3. Following the Hearing, the Parties met and conferred and agreed to the Proposed Order, attached as Exhibit A. The Parties respectfully request that the Court enter the Proposed Order.³

Dated: March 1, 2019
New York, New York

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³ The Oversight Board will today file a separate Informative Motion addressing the issue of an appeal.

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CERTIFICATE OF SERVICE

I hereby certify that I filed this document electronically with the Clerk of the Court using the CM/ECF System, which will send notification of such filing to all parties of record in the captioned case. Further, I directed that the following counsel of record be served by U.S. Mail:

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At New York, New York, this 1st day of March, 2019.

By: /s/ Howard R. Hawkins, Jr.

Howard R. Hawkins, Jr.*

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